

Before the FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of 2002 Biennial Regulatory Review -  
Review of the Commission's Broadcast Ownership Rules  
and Other Rules Adopted Pursuant to Section 202  
of the Telecommunications Act of 1996,  
Notice of Proposed Rulemaking,  
MM Docket No. 02-277, (rel. Sept. 23, 2002)

To: The Secretary, FCC Commissioners, and Chief, Media Bureau

About Docket No. 02-277, The Biennial Review of the FCC's broadcast media  
ownership rules:

The Commission is considering action that as a virtual certainty would  
severely reduce competition, diversity and localism in today's media  
market.

Current rules limit the market power of already huge companies in the  
broadcast industry by assuring there are at least a minimum of competing  
voices, both within one medium, and across media, such as the prohibition  
on owning both a television station and a newspaper in the same market.

It will be difficult to believe in the integrity of commissioners who  
accede to this headlong rush to cynical exploitation of the market for the  
benefit of the few major powers in the field.

I will go so far as to say that those with a social or civic interest in  
this question are more important than those with a financial interest.

It seems clear to me that recent studies by the FCC do not accurately  
demonstrate the negative affects media deregulation and consolidation have  
had, and will have, on media diversity. Their very premise is flawed:  
that we can discover whether consolidation is good by counting how many  
so-called "different" stations or other outlets are available.

I am considering the huge reduction in diversity in radio over several  
years after the relaxation of rules there.

That the increase toward monopoly could be good for information channels  
is simply an untenable position. That it might even be a benign change is  
too outrageous a contention to consider.

The very existence of true debate over public issues is already at stake.

Consolidation has reduced foreign coverage to a bare minimum.

"Cultural Diversity" has come to mean the same thing broadcast in  
different languages.

Informed debate and discussion of current events is part of the founding  
philosophy of our nation.

The public hearing planned by the FCC in Richmond, VA in February 2003 on  
this matter is essential. More of the same is needed in various parts of  
the country, to reach more of the concerned public, before the commission

can claim to have solicited public opinion effectively.

Thank you for your attention,

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